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January 27, 2025

**By ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

Re: New Yorkers for Religious Liberty, Inc., et al. v. City of New York, et al.  
1:22-cv-00752-DG-VMS

Dear Judge Scanlon:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for the defendants, the City of New York, Eric Adams, and Dave Chokshi (“Defendants”) in the above-referenced action. I write to respectfully request that the Court stay the January 31, 2025 deadline for Defendants to submit a response to the Amended Complaint<sup>1</sup>.

By way of background, on November 13, 2024, the United States Court of Appeals for the Second Circuit issued a decision (“Second Circuit Decision”) with respect to Plaintiffs’ appeal of this Court’s August 11, 2022 decision denying Plaintiffs’ motion for a preliminary injunction. On December 2, 2024, the parties appeared for a telephonic status conference before Hon. Diane Gujarati. At that time, Plaintiffs indicated their intention to seek leave to amend the Amended Complaint. The Court directed the parties to “confer and file, by February 3, 2025,” a joint status letter as to their respective positions in light of the Second Circuit decision. See Minute Entry dated December 2, 2024. On January 10, 2025, a Certified Copy of the Second Circuit Decision was entered by the clerk. See ECF. No. 134

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<sup>1</sup> Plaintiffs commenced this proceeding on February 2, 2022, and on May 17, 2022, sought leave of the Court to amend the complaint because certain “allegations were inadvertently deleted from the final draft” of the complaint. See ECF No. 70. On June 17, 2022, Plaintiffs filed the Amended Complaint. See ECF No. 77.

1:22-cv-00752-DG-VMS  
Page 2

On January 24, 2025, this Office contacted Plaintiffs' counsel to determine, *inter alia*, (1) if Plaintiffs still intend to amend the Amended Complaint, and, (2) if Plaintiffs consent to an extension of time for Defendants to submit a response to the Amended Complaint, which response is presently due on January 31, 2025. In response, Plaintiffs' counsel indicated that Plaintiffs do intend to seek leave to amend the Amended Complaint. However, Plaintiffs' counsel did not indicate whether Plaintiffs consent to an extension of the January 31, 2025 deadline.

While Defendants intend to oppose any request by Plaintiffs to amend the Amended Complaint, in the interest of conserving judicial resources and the resources of the parties, Defendants respectfully request that the Court stay the January 31, 2025 deadline for Defendants to respond to the Amended Complaint until a decision has been made by the Court with respect to Plaintiffs' anticipated request to amend the Amended Complaint.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Kathleen M. Linnane

Kathleen M. Linnane  
Senior Counsel

cc: All Counsel of Record  
(By ECF)